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8 **Attorney for Defendant,**  
9 **ADAM IZA**

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9

10 **UNITED STATES OF AMERICA,** ) **CASE NO.: 2:24-CR-00630-PA(AJRx)**  
11 )  
12 **Plaintiff,** ) **DEFENDANT'S EMERGENCY EX**  
13 **vs.** ) **PARTE REQUEST FOR TEMPORARY**  
14 **ADAM IZA.** ) **RELEASE PURSUANT TO 18 U.S.C. §**  
15 ) **3142(i); DECLARATION OF JOSEF**  
16 **Defendant.** ) **SADAT; LETTER FROM DOCTOR**  
17 ) **KEVIN DEPIPARSHAD**  
18 )  
19 )

17 **TO THE HONORABLE JOEL RICHLIN, UNITED STATES DISTRICT JUDGE AND TO**  
18 **ASSISTANT UNITED STATES ATTORNEY DANIEL J. O'BRIEN:**  
19

20 Defendant, ADAM IZA, by and through his counsel of record, Josef Sadat, hereby submits an  
21 update concerning Defendant's current medical status and corresponding emergency request for an  
22 immediate temporary release pursuant to 18 U.S.C. § 3142(i) due to a change of circumstances.  
23

24  
25 **DATED: Dec. 23, 2024**

**LAW OFFICE OF JOSEF SADAT**

26 **By: /s/ Josef Sadat**  
27 **JOSEF SADAT, Esq.**  
28 **Attorney for Defendant,**  
**Adam Iza**

**DECLARATION OF JOSEF SADAT**

I, Josef Sadat, declare as follows:

1. Defendant received leg-lightening surgery on November 11, 2022 by the leading leg-lengthening surgeon in the world, Dr. Kevin Debiparshad of Las Vegas, Nevada.
2. Defendant was supposed to undergo the necessary follow-up surgery with Dr. Debiparshad (to get the hardware/devices removed) more than a year ago but failed to do so because of the lingering fears/trauma surrounding the post-recovery process (he missed his most recently scheduled surgery date on August 26, 2024).
3. On September 24, 2024 and October 1, 2024, medical evaluations of the Defendant were conducted by BOP medical professionals. None of the BOP affiliated doctors and/or medical staff noted any evidence of boils or lumps emerging out of the upper legs of the Defendant where the hardware was still specifically located. Nor did they observe any issues with the Defendant's gait and/or range of motion.
4. On November 18, 2024, an emergency medicine doctor/expert (Dr. Martin Chenevert), personally examined the Defendant. Among other critical findings, Dr.Chenevert noted:

“Mr. Iza has developed a complication of his surgical procedure. This is likely due to either an infection, leakage of the prosthetic material into the tissues, or some other damage to the muscles and nerves as a result of the hardware; Mr. Iza should have his implants removed as soon as possible. Further delay will likely exacerbate the problem and may result in permanent disability and even limb loss; The removal of the implants should be performed by someone with extensive expertise in this area, preferably by Dr. Debiparshad himself.”

- 1           5.     On December 6, 2024, Defense counsel arranged for photographs to be taken of the  
2           Defendant which showed three new and large infectious holes (completely separate from  
3           the previously identified boils/lumps) coming out of the Defendant's left leg near the  
4           hardware. Please see Exhibit A: December 6, 2024 photo of the Defendant.
- 5           6.     On December 9, 2024, Mr. Iza was evaluated by BOP medical staff at MDC.  
6           Shockingly, they claimed yet again that there were no signs of infection or even inflammation.  
7           Please see Exhibit B: Defendant's BOP medical check-up dated 12/9/24).
- 8           7.     On or around December 18, 2024, Defendant was transported to Las Vegas to get the  
9           necessary surgery. However, upon examining the Defendant, the Doctor informed the  
10          Marshal's of the infection while simultaneously indicating that he could not immediately  
11          operate until resolving the infection. According to the defendant, the Doctor initially  
12          stated to him that he would remove the hardware from the right side (where there was no  
13          infection) but not the left because of the infection.
- 14          8.     Ultimately, when the Defendant woke up, he said the Doctor had decided to remove both  
15          implants from each leg. However, the Doctor simultaneously put the Defendant on IV  
16          antibiotics and hospitalized him for several additional days.
- 17          9.     Dr. Depibarshad then discharged the Defendant from his hospital facility on or around  
18          12/21/24 with the understanding that Mr. Iza would be given medical care in conjunction  
19          with a detailed post-rehabilitation treatment plan that he outlined in an email for the  
20          Court to read and in order for Mr. Iza to have optimal healing/prevent any potential  
21          relapses. Please see Exhibit C: Email from Doctor Kevin Depibarshad dated December  
22          23, 2024.

10. Thinking Mr. Iza had been transported to an appropriate medical facility to handle the necessary follow-up medical care, Defendant was instead transported on or around 12/21/24 to a detention facility in Nevada.
11. On December 23, 2024, Defendant spoke to defense counsel for the first time since December 17, 2024. He informed counsel that he was prevented by the Marshal's from making any phone calls to his Attorney and has been chained up almost the entire time. He called counsel to inform him that has been in the hole/solitary confinement the past three days at a detention facility rather than a BOP affiliated hospital and not has not had any follow-up medical care.
12. Defendant must be temporary released back into Doctor Kevin Debiparshad's care where he will receive the proper post-rehabilitation care at an outpatient rehab facility affiliated with the Doctor. Per the email from Doctor Depiparshad, this post-rehabilitation should be for a period of a minimum of two weeks until the next court date on January 7, 2025.
13. The Defendant has requested this medical status update and Exhibits and corresponding emergency request for temporary release not to be filed under seal.
14. AUSA Daniel J. O'Brien opposes this request.

I declare the foregoing to be true and correct under the penalty of perjury under the laws of the United States. Executed on December 23, 2024 at Los Angeles, California.

/s/ Josef Sadat  
Josef Sadat